

U.S. Department of Homeland Security
3400 Concord Road
York, PA 17402



U.S. Immigration
and Customs
Enforcement

January 18, 2017

MEMORANDUM FOR: Tae D. Johnson
Assistant Director, Custody Management

THROUGH: Jay M. Brooks
Deputy Assistant Director, Detention Management Division

FROM: Jennifer Ritchey
Acting Field Office Director

SUBJECT: York County Prison – Waiver Request

Purpose

Provide a waiver for the Philadelphia Field Office, York County Prison (YCP), as it relates to the Environmental Health and Safety Section, (VII)(D) within the 2008 Performance Based National Detention Standards (PBNDS) which states "fire drills shall be conducted and documented at least quarterly in all facility locations including administrative areas".

Background

On October 16, 2015, an ODO Compliance Inspection of the YCP reported non-compliance with this standard. The inspectors found that "fire drills are not conducted quarterly in all areas of the facility".

Discussion:

A corrective action or additional work-around solution is not available. As this standard can be subject to board interpretation a waiver is warranted to avoid future findings of deficiency. YCP is a 550,000 square foot facility housing approximately 2,500 subjects and several hundred staff at any given time. The facility is split up into 5 distinct zones for the purpose of fire suppression and evacuation. All locations including administrative areas are included into a zone. Each zone conducts a minimum of one fire drill per month. This practice exceeds the quarterly fire drills described in the standard. Inspection team members found YCP deficient as they identified a single location within a zone that did not perform a fire drill in a given quarter despite the fact that the zone had performed three fire drills within the quarter. Given the size of YCP and number of people, performing fire drills in zones is an efficient way of performing fire drills while maintaining safety, security and continued operations within the facility.

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Recommendation

I recommend the authorization of a waiver for the York County Prison, relating to the Environmental Health and Safety, section (VII)(D) within the 2008 PBNDS.

Approve / date fnb 2/1/17 Disapprove / date _____
Modify / date _____ Needs more discussion _____